Tisa, Kimberly

From: Brent Henebry <BHenebry@fando.com>
Sent: Monday, March 07, 2016 8:49 AM
To: Tisa, Kimberly; gary.trombly@ct.gov
Cc: Kevin Vanderveer; FLORESLOVO, Gabriela (EthosEnergy Group) (Gabriela.Floreslovo@ethosenergygroup.com); John Hankins
Subject: FW: Halfway House Road, Windsor Locks CT Application Addendum
Attachments: Fig 4 Rev - Proposed Clean-Up Plan_Soil.pdf; Fig 3 Rev - Proposed Clean-Up Plan_Concrete.pdf

Kim, thank you for providing us with your comments on the application addendum for the Halfway House Road parcel in Windsor Locks, Connecticut. Below please find your comments and our responses in blue font.

1. Page 1, last paragraph. There is reference to a submittal dated October 15, 2014. Please confirm this date is correct as neither EPA nor CTDEEP have such dated submittal.

   This was a typographical error. The date should be October 15, 2013.

2. Please clarify the relationship between NDT Systems and Ethos Energy Group (Wood Group/Siemens joint entity).

   The property was owned by Wood Group Power, LLC, which is one of many legal entities that formed the Wood Group Gas Turbines Services Division. In May 2014, The Wood Group entered into a joint venture with Siemens where each party contributed one of its Divisions/BUs to form a new company named EthosEnergy. Wood Group contributed its Gas Turbine Services Division to the joint venture and included in that its Wood Group Power, LLC legal entity. Because of the environmental issues with the subject property, the parties agreed to carve out the property from the JV, and prior to closing, Wood Group transferred the ownership of the property from Wood Group Power, LLC to NDT systems which is another wholly owned Wood Group entity. The transfer occurred only to facilitate the carve out and allow Wood Group to maintain full responsibility for the site.

3. It was identified that Kennametal owned the property from approximately 1965 to the mid-1980s, Turbine Engine Services from approx. 1985 to late 1990s and Wood Group Turbine Engine Services from late 1990s. In April 2014 the property was sold to NDT Systems. It is not clear if there was a name change for Wood Group between the late 1990s and 2014 since the October 2013 plan was submitted by Wood Group Power, Inc. Please clarify. Please also provide information on overall property size, the square footage of the current building, and how long the building has been vacant.

   The Wood Group Turbine Engine Services Corporation became Wood Group Gas Turbines, Inc. in January 2000; the name changed to Wood Group Power, Inc. in February 2001, and later to Wood Group Power, LLC in December 2013.

   According to town records, the site comprises two parcels, a 5.12-acre parcel (main site) and a 0.82-acre parcel (located west of the building). The site building is approximately 39,000 square feet. Industrial operations at the site ceased in October 2008. The building was used for warehouse space until April 2014 and has been vacant since then.

4. Page 3, Item 2. It is indicated that concrete will be removed to the nearest point exhibiting PCB concentrations < 1 ppm. Figure 2 shows the proposed concrete cleanup, but the removal extent does not extend to the points with PCB concentrations < 1 ppm in all locations. For example, the extent of concrete

removal includes P1-C416 (1.2 ppm) but does not extend to the next < 1 ppm PCB location of P1-C411 or P1-C412. Thus, clarification on concrete removal is needed. Please also see specific comments 5, 8, and 11 regarding concrete.

Following the removal of concrete from the areas shown on *Figure 2*, confirmatory concrete samples will be collected at 3-meter (10-foot) intervals from the edges of the remediated areas. A revised *Figure 2* showing the proposed initial verification sampling locations is attached.

5. Page 6, Item 2. It is indicated that concrete verification sampling will be conducted on a 3-meter grid. In lieu of the removal referenced in Comment 4 above, sampling may be conducted. However, clarification on where verification samples will be collected is requested. Please provide a figure showing the proposed initial verification sampling locations following removal of the concrete areas shown on Figure 2. Please also see specific comments 8 and 11.

   See Comment 4.

6. Page 7. Item 3.a). It is indicated that the concrete pipe will be sampled at the location where it enters the building. However, it then refers to soil beneath the building. Is this correct?

   The word "soil" should have been "pipe." The referenced text in Item 3a should read: If PCB concentrations in the pipe beneath the building are less than or equal to 10 ppm, use the building as cap.

7. Pages 5 through 7. Through these pages, the summary of remedial activities appears to define the interior concrete floor as either a "cap" or an "engineered control" that will be driven by the PCB concentrations remaining beneath the floor. With exception of the execution of a deed notice under § 761.61(a)(8) versus an ELUR, it is unclear if there is any difference between the construction of the final "cap" versus the "engineered control". Please clarify and also see specific comment 11.b.

   The terms "cap" and "engineered control" refer to the same remedy; however, they carry different regulatory connotations:

   - **Cap** – If PCB concentrations remaining beneath the building following soil excavation are above 1 ppm but less than or equal to 10 ppm, then the building will serve as a "cap" as described by TSCA. The building will also serve to render the soil inaccessible under the Connecticut Remediation Standard Regulations (RSRs), which requires recording an environmental land use restriction.

   - **Engineered Control** – In the event that some soil containing PCB concentrations above 10 ppm cannot be removed, the RSRs allow for the use of a DEEP-approved engineered control to isolate the soil. The remedy is still the building, but once the remaining PCB concentrations exceed 10 ppm, then DEEP must approve it as an engineered control. An ELUR will still be necessary; however, there are also other state regulatory obligations that go along with maintaining an "engineered control" vs. the TSCA "cap" referenced above.

8. Page 8. Item 2.a. Clarification on removal of the interior concrete floor is requested. Figure 2 of the October 2015 plan shows those areas of the concrete floor identified to contain > 1 ppm PCBs. The plan also indicates that those sections will be removed in their entirety for disposal. Thus, it is unclear exactly what concrete sampling is proposed. (See previous comments pertaining to concrete removal/sampling).

   Inside the building, a total of approximately 2,000 square feet of concrete will be removed from two areas to access underlying PCB-impacted soil located beneath. The concrete is not expected to be impacted because it was poured at some point after the PCB release occurred and is likely separated from the PCB-impacted soil by a sub-base material. In order to confirm this, we will

collect 1 concrete sample per 1,000 square feet (2 samples currently anticipated). The samples will be collected from the underside of the concrete, and we will target areas where the highest concentrations of PCBs were detected. Assuming PCBs are not detected, the concrete will be recycled as non-contaminated material. If PCBs are detected, the concrete will be disposed as PCB remediation waste.

9. Page 8. Item 1.a. Given that PCBs > 1 ppm extend outside the building and beneath asphalt, it is unclear how the asphalt will be sampled to confirm PCB concentrations. Please provide further discussion.

The area of asphalt to be removed in the upper release area is approximately 6,600 square feet. Similar to the concrete discussed in Comment 8, the asphalt is not anticipated to be impacted by PCBs because the parking lot was constructed after the PCB release and is likely separated from the PCB-impacted soil by sub-base material. As with the concrete, we will collect a minimum of 1 sample per 1,000 square feet (7 samples anticipated). The samples will collected from the underside of the asphalt, and we will target areas where the highest concentrations of PCBs were detected. Assuming PCBs are not detected, the asphalt will be recycled as non-contaminated material. If PCBs are detected the asphalt will be disposed as PCB remediation waste.

10. Figure 4 in the October 2015 Plan. The legend for soil within the building footprint (green hatched areas) indicates that the proposed PCB cleanup standard is 1 ppm. In the text, the proposed PCB cleanup standard is 10 ppm for soil within the building footprint. Please clarify.

The 1 ppm reference is a typo. It should read 10 ppm. A corrected *Figure 4* is attached.

11. EPA understands the current proposed PCB remediation plan to include the following actions:

- Excavate PCB-contaminated soil with greater than (">") 1 part per million ("ppm") located exterior to the building and including the lower and upper swale release areas, with exception of the delineated wetland area in the lower swale release area. Wetland sediments with > 0.3 ppm will be excavated and the wetland will be restored.

  Clarification: The 0.3 ppm refers to the criteria to be used to delineate the vertical extent of excavation within the wetland. Laterally, wetland soil will be removed to the edge of the delineated wetland area. Beyond the delineated wetland, soil will be remediated to 1 ppm.

- Remove that portion of the concrete drainage pipe located exterior to the building, collect soil samples at joints or other pipe fractures and a concrete pipe sample at the entry point to the building, and analyze samples to confirm PCB concentrations are less than or equal to ("≤") 1 ppm in soil and ≤ 10 ppm in the concrete pipe

- Remove the areas of the building interior concrete floor slab with PCBs > 1 ppm in their entirety (approximately 6,215 square feet)

- Excavate PCB-contaminated soil with > 10 ppm located beneath the building interior concrete floor

- Collect post-removal concrete floor and soil samples to confirm PCB cleanup standards have been achieved (*please see EPA comments above regarding concrete sampling*)

- Restore the interior concrete floor

- Dispose of all *PCB remediation waste* (i.e., soil, concrete) as a ≥ 50 ppm PCB waste in accordance with § 761.61(a)(5)(i)(B)(*2*)(*iii*) at a TSCA-permitted disposal facility or RCRA hazardous waste landfill

- Record a deed notice to document Site conditions and use restrictions and prohibitions as required under 40 CFR § 761.61(a)(8)

- As a contingency, if PCBs > 10 ppm remain in the soil and/or the concrete pipe beneath the concrete floor that cannot be readily removed, use the concrete floor as an engineered control and record an ELUR to document Site conditions and use restrictions/prohibitions

a. Please confirm that EPA's understanding of the proposed remediation action is correct. If so, please be aware that EPA did identify discrepancies between the text of the plan as outlined above, and the information contained in Appendix A, Page 18 of 19. For example, in the text, it was indicated that > 1 ppm PCB-contaminated concrete would be removed in its entirety whereas, in Appendix A it is indicated that portions of the concrete would be scarified rather than removed in their entirety. If EPA's summary above is not correct, please clarify.

We concur that EPA's summary is correct. The text in *Appendix A* that references the top 2 inches of concrete requiring remediation was inadvertently left over from a previous version of the conceptual model. There is no intent to scarify portions of the floor. Concrete with PCB concentrations above 1 ppm will be removed as outlined in the plan.

b. Following removal of the PCB-impacted concrete floor with > 1 ppm, it is indicated that the floor will be restored. Please clarify what this means as it pertains to the cap requirements under 40 CFR § 761.61(a)(7).

The soil beneath the PCB-impacted concrete in the older portion of the building has been sampled and does not contain PCBs above 1 ppm; therefore, the restored floor in this area will not serve as a cap.

Please let us know if you will require any additional information to approve the remedial plan.

Regards,

Brent Henebry, LEP
Associate
Fuss & O'Neill, Inc | 146 Hartford Road | Manchester, CT 06040
860.646.2469 x5369 | bhenebry@fando.com | cell: 860.462.1493
www.fando.com | twitter | facebook | linkedin

From: Tisa, Kimberly [mailto:Tisa.Kimberly@epa.gov]
Sent: Thursday, March 03, 2016 9:32 AM
To: Eghneim, Gus (EthosEnergy); Brent Henebry; gary.trombly@ct.gov
Cc: John Hankins; Kevin Vanderveer; Tisa, Kimberly
Subject: RE: Halfway House Road, Windsor Locks CT Application Addendum

EPA has completed its review of the Addendum to the Application for Clean-Up of PCB Remediation Waste dated October 2015 (Addendum). The Application for Clean-Up of PCB Remediation Waste was dated October 2013.

EPA previously provided comments on the proposed PCB plan by letters dated March 27, 2014 and May 7, 2014. EPA also understands that Ethos has been working with CTDEEP to address

EPA's comments on the Addendum dated October 2015 follow.

1. Page 1, last paragraph. There is reference to a submittal dated October 15, 2014. Please confirm this date is correct as neither EPA nor CTDEEP have such dated submittal.